

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*INFORMATION ASSOCIATED WITH TWITTER PROFILE
USERNAME @ABDULRAZZAQALI AND ID NUMBER
377158338 AT HTTP://TWITTER.COM/USER THAT IS
STORED AT PREMISES CONTROLLED BY TWITTER

Case No.

2:16-mj-588

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A.

located in the Southern District of Ohio, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section**Offense Description*

18 U.S.C. 2339B

Providing material support and resources to a designated foreign terrorist organization.

The application is based on these facts:

- ☒ Continued on the attached sheet.
☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date: Dec. 1, 2016City and state: Columbus, OH*Applicant's signature*

T. Gregory Nades Jr. FBI Special Agent

*Printed name and title**Judge's signature*

Elizabeth Preston Deavers, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH
TWITTER PROFILE USERNAME
@ABDULRAZZAQALI AND
IDENTIFICATION NUMBER 377158338
AT HTTP://TWITTER.COM/USER THAT IS
STORED AT PREMISES CONTROLLED BY
TWITTER

Case No. 2:16-mj-588

Filed Under Seal

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, T. Gregory Naples, Jr., being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Twitter account that is stored at premises owned, maintained, controlled, or operated by Twitter, a social-networking company headquartered in San Francisco, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require Twitter to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the Twitter account.

2. The Affiant is a Special Agent with the Federal Bureau of Investigation (FBI), Cincinnati Division, Columbus Resident Agency. The Affiant has been a Special Agent for 14 years and has been assigned to an International Terrorism Squad for six years and Joint Terrorism Task Forces ("JTTF") for eight years in both Washington, DC and Columbus, OH. The Affiant has been involved in the preparation and execution of numerous federal search

warrants for various types of violations. During his current assignment to the JTTF, the Affiant has been a Case Agent and Co-Case Agent for multiple international terrorism investigations. While assigned to the JTTF, the Affiant has received specialized training in international terrorism. Furthermore, the Affiant has received training in computer-related crime as well as the criminal use of email, social media, encrypted messaging applications, and telephonic communications.

3. The statements contained herein are based on an investigation conducted by the Affiant and others, on his experience and training as a Special Agent on the JTTF, and on other relevant information provided to him by other FBI Special Agents and law enforcement officials. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of the Affiant's knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 2339B (providing, attempting to provide, and conspiring to provide material support to a Foreign Terrorist Organization ("FTO")) have been committed by ABDUL RAZAK ALI ARTAN (hereinafter referred to as "ARTAN"). There is also probable cause to search the Twitter account, as described in Attachment A, for evidence of these crimes, as described in Attachment B.

DESIGNATED FOREIGN TERRORIST ORGANIZATION

5. On October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

6. On May 15, 2014, the Secretary of State amended the designation of AQI as a FTO to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham (“ISIS”), the Islamic State of Iraq and Syria (“ISIS”), ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. In an audio recording publicly released on June 29, 2014, ISIL announced a formal change of its name to Islamic State. On or about September 21, 2014, ISIL spokesperson Abu Muhammad al-Adnani called for attacks against citizens—civilian or military—of the countries participating in the United States-led coalition against ISIL. On September 21, 2015, the Secretary added the following aliases to the ISIL listing: Islamic State, ISIL, and ISIS. To date, ISIL remains a designated FTO.

PROBABLE CAUSE

7. On November 28, 2016, at approximately 9:42 a.m., a black male subject was driving a vehicle in the area of the intersection of West 19th Avenue and College Road North on The Ohio State University campus. According to reports from the scene, the subject purposely struck and attempted to strike multiple pedestrians with the moving vehicle. The subject subsequently exited the vehicle and stabbed and attempted to stab numerous people with a knife. A local officer responded to the scene, encountered the subject, and fatally wounded him. A driver’s license found on the person of the subject identified him as ABDUL R. ALI ARTAN, date of birth January 1, 1998, Ohio Driver’s License #UJ847597, with an address of 353 Nationwide Boulevard, Columbus, Ohio. An Apple iPhone 5S and the laptop were also found in the vehicle with ARTAN. There were approximately fourteen (14) victims as a result of this

attack.¹

8. According to immigration paperwork filed with the U.S. government, ARTAN, a native of Somalia, left Somalia in 2007 with his family to live in Pakistan. In June of 2014, he entered the United States from Pakistan as a refugee. He subsequently obtained Lawful Permanent Resident (“LPR”) status and was a student at The Ohio State University.

9. FBI conducted a search for any social media presence/activity related to ARTAN and identified the following Facebook page as belonging to him:

<https://www.facebook.com/abdi.razaq.3>. The photo on the Facebook page appeared to match the photo of ARTAN from the driver’s license recovered from him at the scene of the attack.

Records received from Facebook, Inc. indicate that the email address associated with ARTAN’s Facebook account was **PLAYERS_SKILLS@HOTMAIL.COM**. At approximately 9:49 AM,² which appears to be the time period just prior to the attack, ARTAN made a public Facebook post which stated in its entirety:

In the name of Allah, the most merciful and the most gracious.

(Screenshot this before it gets deleted)

My brothers and sisters, I am sick and tired of seeing my fellow Muslim brothers and sisters being killed and tortured EVERYWHERE. Seeing my fellow Muslims being tortured, raped and killed in Burma led to a boiling point. I can’t take it anymore.

America! Stop interfering with other countries, especially the Muslim Ummah. We are

¹ In prior affidavits, your affiant noted that there were approximately nine (9) victims. I have since learned that there were approximately fourteen (14) victims from this attack.

² In prior affidavits, your affiant noted that the time was approximately 9:30 to 9:45 AM. I have since learned that the time was approximately 9:49 AM.

not weak. We are not weak, remember that.

If you want us Muslims to stop carrying lone wolf attacks, then make peace with “dawla in al sham.” Make a pact or a treaty with them where you promise to leave them alone, you and your fellow apostate allies.

By Allah, we will not let you sleep unless you give peace to the Muslims. You will not celebrate or enjoy any holiday.

Stop the killing of the Muslims in Burma.

Btw, every single Muslim who disapproves of my actions is a sleeper cell, waiting for a signal. I am warning you Oh America!

Ano, a message to the Muslims, don't listen to celebrity scholars who sold their deen. I am talking about the likes of Yasir Qadhi, Omar Sulleman, Nouman, Mufti Menk and the list goes on. Beware of Al-Maghrib Institute. Listen instead to our hero Imam Anwar Al-Awlaki.

Let me ask you this question if the Muhammad peace and blessings upon him and his Sahaba were here today, Wouldn't the Western Media call them terrorists?

To conclude.

By Allah, I am willing to kill a billion infidels in retribution for a single DISABLED Muslim/Muslimun.

(Screenshot this before it get deleted)

10. Based on my training and experience, your Affiant understands the term “lone wolf attacks” to refer to a terrorist who commits violent acts alone, even if he/she is influenced or motivated by an ideology or a terrorist organization. Additionally, your Affiant understands that the phrase “dawla in al sham” is another term for ISIL. Moreover, based on my training and

experience, your Affiant also understands that the individual referred to as “Imam Anwar Al-Awlaki” is Anwar Al-Awlaki, the now-deceased American-born Islamic lecturer and Al Qa’ida in the Arabian Peninsula (AQAP) leader who espoused violent jihad against Westerners and encouraged the emigration of foreign fighters to countries around the world to engage in violent jihad. Based on my training and experience, your affiant is aware that many ISIL supporters watch and listen to recordings of Al-Awlaki’s calls and purported justifications for engaging in violent jihad. AQAP also publishes an English language magazine called *Inspire* that contains propaganda espousing how to conduct various terrorist attacks.

11. Based on my knowledge and experience, jihadist propaganda has long counseled followers to commit acts of violence like the one allegedly committed by ARTAN; i.e., by using vehicles and knives as weapons. For example, the Fall 2010 issue of *Inspire* Magazine, a publication by the media arm of AQAP, described such an operation. It encouraged jihadists to “use a pickup truck as a mowing machine, not to mow grass but to mow down the enemies of Allah.” More recently, the Autumn 2016 issue of *Inspire* Magazine, encouraged “lone mujahids” to commit acts of violent jihad “using a truck as done by the Lone Mujahid in the Nice operation.” Similarly, the July 2016 issue of *Dabiq*, ISIL’s initial official magazine, praised the “brother” who answered “the Islamic State’s calls to target nations participating in the Crusader coalition fighting the Caliphate” by “killing more than 80 people and injuring more than 300 others” in the Nice attacks. In September 2016, ISIL changed the name of its official magazine to *Rumiyah*. In November 2016, ISIL released *Rumiyah*, Issue 3, which has an article titled “Just Terror Tactics,” which again focuses on a vehicle attack as a primary attack weapon with a secondary attack using a knife or gun to maximize the “kill count” and terror. Some of the highlights in the article state the following:

“Though being an essential part of modern life, very few actually comprehend the deadly and destructive capability of the motor vehicle and its capacity of reaping large numbers of casualties if used in a premeditated manner.”

“The method of such an attack is that a vehicle is plunged at a high speed into a large congregation of kuffar, smashing their bodies with the vehicle’s strong outer frame, while advancing forward – crushing their heads, torsos, and limbs under the vehicle’s wheels and chassis – and leaving behind a trail of carnage.”

“Applicable Targets: Large outdoor conventions and celebrations, Pedestrian-congested streets, Outdoor Markets, Festivals, Parades, Political Rallies”

“In a bid to ensure utmost carnage upon the enemies of Allah, it is imperative that one does not exit his vehicle during the attack. Rather, he should remain inside, driving over the already harvested kuffar, and continue crushing their remains until it becomes physically impossible to continue by vehicle. At this stage, one may exit the vehicle and finish his operation on foot, if he was able to obtain a secondary weapon.”

“Having a secondary weapon, such as a gun or a knife, is also a great way to combine a vehicle attack with other forms of attacks. Depending on what is obtained, the kill count can be maximized and the level of terror resulting from the attack can be raised. This could also increase the possibility of attaining shahadah, which is the best of departures from this Dunya into the larger expanse of the Akhirah.”

12. On November 29, 2016, on behalf of ISIL’s media office, A’maq Agency, Twitter user “Omar Ansary” tweeted in Arabic: “A source to A’maq Agency: The executor of the American state of #Ohio attack is an Islamic State soldier who carried out the operation in response to calls to target the citizens of international coalition states.”

13. Based on my experience, the behavior displayed by ARTAN during this attack and information found on his Facebook page is consistent with someone who may have been motivated or inspired by social media postings or through direct contact with others on social media, such as Twitter, to commit acts of violence for the purpose of committing a terrorist attack on behalf of ISIL. Evidence of terrorist motivations or other criminal intent is being sought as well as any evidence of a conspiracy to commit terrorist acts, potentially involving additional accomplices.

14. Using ARTAN's email address of **PLAYERS_SKILLS@HOTMAIL.COM**, the FBI identified the Twitter account of @abdulrazzaqali. On November 29, 2016, the FBI requested the voluntary disclosure of information pursuant to 18 U.S.C. § 2702 from Twitter related to the subject account, @abdulrazzaqali. This same email address is associated with ARTAN's Facebook account, UID 1472880660 "Abdi Razaq," which is the same Facebook account which made the aforementioned post in paragraph 9 on the day of the attack. Furthermore, the Twitter account @abdulrazzaqali was created on September 9, 2011 and is still active. The Twitter account identification number is 377158338. The IP address where the Twitter account was created is 175.110.89.119, which, according to www.iplocation.net, is located in Rawalpindi, Pakistan. Based on Department of Homeland Security records, ARTAN resided in Pakistan from approximately 2007 to June of 2014.

15. On or about November 28, 2016, a preservation request was sent to Twitter to preserve all records associated with @abdulrazzaqali.

TWITTER

16. Based on the Affiant's training and experience, cellular telephones and laptops, both of which were found in ARTAN's vehicle at the time of the attack, routinely include

applications for a variety of social media platforms, such as Facebook, as noted above, and Twitter, which as detailed below, can be used to communicate with others.

17. Twitter owns and operates a free-access social-networking website of the same name that can be accessed at <http://www.twitter.com>. Twitter allows its users to create their own profile pages, which can include a short biography, a photo of themselves, and location information. Twitter also permits users create and read 140-character messages called “Tweets,” and to restrict their “Tweets” to individuals whom they approve. These features are described in more detail below.

18. Upon creating a Twitter account, a Twitter user must create a unique Twitter username and an account password, and the user may also select a different name of 20 characters or fewer to identify his or her Twitter account. The Twitter user may also change this username, password, and name without having to open a new Twitter account.

19. Twitter asks users to provide basic identity and contact information, either during the registration process or thereafter. This information may include the user’s full name, e-mail addresses, physical address (including city, state, and zip code), date of birth, gender, hometown, occupation, and other personal identifiers. For each user, Twitter may retain information about the date and time at which the user’s profile was created, the date and time at which the account was created, and the Internet Protocol (“IP”) address at the time of sign-up. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access a given Twitter account.

20. A Twitter user can post a personal photograph or image (also known as an “avatar”) to his or her profile, and can also change the profile background or theme for his or her

account page. In addition, Twitter users can post “bios” of 160 characters or fewer to their profile pages.

21. Twitter also keeps IP logs for each user. These logs contain information about the user’s logins to Twitter including, for each access, the IP address assigned to the user and the date stamp at the time the user accessed his or her profile.

22. As discussed above, Twitter users can use their Twitter accounts to post “Tweets” of 140 characters or fewer. Each Tweet includes a timestamp that displays when the Tweet was posted to Twitter. Twitter users can also “favorite,” “retweet,” or reply to the Tweets of other users. In addition, when a Tweet includes a Twitter username, often preceded by the @ sign, Twitter designates that Tweet a “mention” of the identified user. In the “Connect” tab for each account, Twitter provides the user with a list of other users who have “favorited” or “retweeted” the user’s own Tweets, as well as a list of all Tweets that include the user’s username (*i.e.*, a list of all “mentions” and “replies” for that username).

23. Twitter users can include photographs or images in their Tweets. Each Twitter account also is provided a user gallery that includes images that the user has shared on Twitter, including images uploaded by other services.

24. Twitter users can also opt to include location data in their Tweets, which will reveal the users’ locations at the time they post each Tweet. This “Tweet With Location” function is off by default, so Twitter users must opt in to the service. In addition, Twitter users may delete their past location data.

25. When Twitter users want to post a Tweet that includes a link to a website, they can use Twitter’s link service, which converts the longer website link into a shortened link that begins with <http://t.co>. This link service measures how many times a link has been clicked.

26. A Twitter user can “follow” other Twitter users, which means subscribing to those users’ Tweets and site updates. Each user profile page includes a list of the people who are following that user (*i.e.*, the user’s “followers” list) and a list of people whom that user follows (*i.e.*, the user’s “following” list). Twitter users can “unfollow” users whom they previously followed, and they can also adjust the privacy settings for their profile so that their Tweets are visible only to the people whom they approve, rather than to the public (which is the default setting). A Twitter user can also group other Twitter users into “lists” that display on the right side of the user’s home page on Twitter. Twitter also provides users with a list of “Who to Follow,” which includes a few recommendations of Twitter accounts that the user may find interesting, based on the types of accounts that the user is already following and who those people follow.

27. In addition to posting Tweets, a Twitter user can also send Direct Messages (DMs) to one of his or her followers. These messages are typically visible only to the sender and the recipient, and both the sender and the recipient have the power to delete the message from the inboxes of both users. As of January 2012, Twitter displayed only the last 100 DMs for a particular user, but older DMs are stored on Twitter’s database.

28. Twitter users can configure the settings for their Twitter accounts in numerous ways. For example, a Twitter user can configure his or her Twitter account to send updates to the user’s mobile phone, and the user can also set up a “sleep time” during which Twitter updates will not be sent to the user’s phone.

29. Twitter includes a search function that enables its users to search all public Tweets for keywords, usernames, or subject, among other things. A Twitter user may save up to 25 past searches.

30. Twitter users can connect their Twitter accounts to third-party websites and applications, which may grant these websites and applications access to the users' public Twitter profiles.

31. If a Twitter user does not want to interact with another user on Twitter, the first user can "block" the second user from following his or her account.

32. In some cases, Twitter users may communicate directly with Twitter about issues relating to their account, such as technical problems or complaints. Social-networking providers like Twitter typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications. Twitter may also suspend a particular user for breaching Twitter's terms of service, during which time the Twitter user will be prevented from using Twitter's services.

33. As explained herein, information stored in connection with a Twitter account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Twitter user's account information, IP log, stored electronic communications, and other data retained by Twitter, can indicate who has used or controlled the Twitter account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, communications, "tweets" (status updates) and "tweeted" photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Twitter account at a relevant time. Further, Twitter account activity can show how and when the account was accessed or

used. For example, as described herein, Twitter logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Twitter access, use, and events relating to the crime under investigation. Additionally, Twitter builds geo-location into some of its services. If enabled by the user, physical location is automatically added to “tweeted” communications. This geographic and timeline information may tend to either inculcate or exculpate the Twitter account owner. Last, Twitter account activity may provide relevant insight into the Twitter account owner’s state of mind as it relates to the offense under investigation. For example, information on the Twitter account may indicate the owner’s motive and intent to commit a crime (e.g., information indicating a criminal plan) or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

34. Therefore, the computers of Twitter are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Twitter, such as account access information, transaction information, and other account information.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

35. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Twitter to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B.

Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION


36. Based on the forgoing, I request that the Court issue the proposed search warrant.

37. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711(3)(A)(i), 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is a district court of the United States that has jurisdiction over the offense being investigated.

38. Your Affiant respectfully requests that this Court order that the government is allowed to share the information obtained from this search (to include copies of digital media) with any government agency investigating, or aiding in the investigation of, this case or related matters.

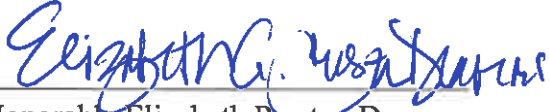
39. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

Respectfully submitted,



T. Gregory Naples, Jr.
Special Agent
Federal Bureau of Investigation

SUBSCRIBED TO AND SWORN TO
BEFORE ME THIS 1st DAY
OF DECEMBER, 2016



Honorable Elizabeth Preston Deavers
U.S. Magistrate Judge
Southern District of Ohio

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the Twitter profile with username @abdulrazzaqali and identification number 377158338 at <http://twitter.com/user> that is stored at premises owned, maintained, controlled, or operated by Twitter, a company headquartered in San Francisco, California.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Twitter

To the extent that the information described in Attachment A is within the possession, custody, or control of Twitter, including any messages, records, files, logs, or information that have been deleted but are still available to Twitter, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Twitter is required to disclose the following information to the government for each account listed in Attachment A:

- a. All identity and contact information, including full name, e-mail address, physical address (including city, state, and zip code), date of birth, gender, hometown, occupation, and other personal identifiers;
- b. All past and current usernames, account passwords, and names associated with the account;
- c. The dates and times at which the account and profile were created, and the Internet Protocol (“IP”) address at the time of sign-up;
- d. All IP logs and other documents showing the IP address, date, and time of each login to the account;
- e. All data and information associated with the profile page, including photographs, “bios,” and profile backgrounds and themes;
- f. All “Tweets” and Direct Messages sent, received, “favorited,” or retweeted by the account, and all photographs or images included in those Tweets and Direct Messages;

- g. All information from the “Connect” tab for the account, including all lists of Twitter users who have favorited or retweeted Tweets posted by the account, as well as a list of all Tweets that include the username associated with the account (*i.e.*, “mentions” or “replies”);
- h. All photographs and images in the user gallery for the account;
- i. All location data associated with the account, including all information collected by the “Tweet With Location” service;
- j. All information about the account’s use of Twitter’s link service, including all longer website links that were shortened by the service, all resulting shortened links, and all information about the number of times that a link posted by the account was clicked;
- k. All data and information that has been deleted by the user;
- l. A list of all of the people that the user follows on Twitter and all people who are following the user (*i.e.*, the user’s “following” list and “followers” list);
- m. A list of all users that the account has “unfollowed” or blocked;
- n. All “lists” created by the account;
- o. All information on the “Who to Follow” list for the account;
- p. All privacy and account settings;
- q. All records of Twitter searches performed by the account, including all past searches saved by the account;
- r. All information about connections between the account and third-party websites and applications;

- s. All records pertaining to communications between Twitter and any person regarding the user or the user's Twitter account, including contacts with support services, and all records of actions taken, including suspensions of the account.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of 18 U.S.C. § 2339B involving ARTAN since June of 2014, including, for each user ID identified on Attachment A, information pertaining to the following matters:

- a. The provision, attempted provision, or conspiracy to provide material support to a Foreign Terrorist Organization ("FTO");
- b. Evidence indicating how and when the Twitter account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Twitter account owner;
- c. Evidence indicating the Twitter account owner's state of mind as it relates to the crime under investigation;
- d. The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s) if not solely ARTAN.

CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS RECORDS
PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Twitter, and my official title is _____. I am a custodian of records for Twitter. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Twitter, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Twitter; and
- c. such records were made by Twitter as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

Date

Signature